COMMONWEALTH OF PUERTO RICO / OFFICE OF THE GOVERNOR

Environmental Quality Board

3C

October 28, 1981

PRT 0000 10066

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CARIBBEAN OFFICE
U. S. ENVIRONMENTAL
PROTECTION AGENCY

Mr. Carlos E. O'Neill, P.E.
Environmental Engineer
Solid and Hazardous Waste Program
U.S. Environmental Protection
Agency
P.O. Box 792
San Juan, Puerto Rico 00902

Dear Mr. O'Neill:

We are including all the information in regard to the Full RCRA Interim Status Inspection, realized on July 8, of the current year, to the Eli Lilly and Company located in Mayaguez, Puerto Rico.

Please do not hesitate to contact us for any additional information.

Cordially yours,

Eng. Luis E. de la Cruz
Director
Land Pollution Control Program

NEW YORK, N.Y. 10007

October 28, 1981

Subject

1. Memorandum to Eng. Luis E. de la Cruz
   Director
   Solid, Toxic and Hazardous Waste Program

2. Letter to Eng. Carlos E. O'Neill
   Environmental Engineer
   Solid, and Hazardous Waste Program

3. Report of the inspection
   Eli Lilly and Company in Mayaguez
   (Eli Lilly Industries)

4. Letter to Mr. Vicente Díaz
   Project Engineer
   Eli Lilly Industries

5. RCRA Generator Inspection Form

6. RCRA Treatment, Storage and Disposal Facility Inspection Form
   For TSD Facilities Only

7. RCRA Inspection Review Sheet

8. Attachments

   1. Chemical Analysis of the sludge generated
   2. Hazardous Waste Permited List
   3. Hazardous Waste Manifest
   4. Location Plan
   5. Schematic of Production Facilities
   6. Waste Water Treatment Facility
   7. Effluent Discharge to the River
   8 y9. Copy of the waste analysis of the Waste Treatment Plant
   10. Letter to U.S. Environmental Protection Agency RE: Delisting
   11y12. Diagrams and photographs
   13. Hazardous Waste List, (inventory)
   14. Full Consumption and percent Sulfur Content report
   15. Brule incinerator record copy
   16. Copy of the Part A Interim Status Permit Application

MAR 30 11 23 AM '82
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

RCRA GENERATOR INSPECTION FORM

COMPANY NAME:
Eli Lilly and Company, Inc.,
(Eli Lilly Industries)

COMPANY POSTAL ADDRESS:
G.P.O. Box 1748
Mayaguez, P.R. 00708

COMPANY LOCAL ADDRESS:
Road 2 Km 146.7
Bo. Sabaneta
Mayaguez, Puerto Rico 00708

COMPANY CONTACT OR OFFICIAL/ TITLE:
Eng. Vicente Díaz
Project Engineer

EPA I.D. NUMBER:
PRT000010066

INSPECTOR'S NAME/ ORGANIZATION:
Mr. Tomás Sanabria / Chemist

BRANCH/ORGANIZATION:
Hazardous Waste Bureau
Environmental Quality Board
Santurce, Puerto Rico

DATE OF INSPECTION:
July 8, 1981.

☑ CHECK IF FACILITY IS ALSO A TSD FACILITY.

☐ CHECK IF FACILITY IS ALSO TRANSPORTER.

	YES	NO	DON'T KNOW
(1) Is there a reason to believe that the facility has hazardous waste on site?	✓	___	___

a. If yes, what leads you to believe it is hazardous waste: Check appropriate box:

☑ Company admits that its waste is hazardous during the inspection.

☑ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☑ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (S 261.31) (F002, F003 and F005)

The company generate D001 and D002, non listed ignitable waste and non listed corrosive waste respectly.

	YES	NO	DON'T KNOW
☐ The waste material is listed in the regulations as a hazardous waste from a specific source (S 261.32) — not apply			
☐ The material or product is listed in the regulations as a discarded commercial chemical product (S 261.33) — not apply			
☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report) — The company analized the sludge that result of its Treatment Plant. The analysis was performed by Orlando Laboratories, Inc. However the sludge resulted be non-hazardous. (For more details, please refer to report and attachment #1).			
☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain) — not apply.			

b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials? not apply. ___ ___ ___

Please explain:

not apply.

	YES	NO	DON'T KNOW
c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.			

Please refer to attachment #2

d. Describe the activities that result in the generation of hazardous waste.

The raw materials are passed through chemical reactions, distillations, extractions, separations and drying processes to produce intermidiates, final products and hazardous waste.

(2) Is hazardous waste stored on site?	✓	___	___
a. What is the longest period that it has been accumulated? The company is staraging since november 19, 1980. However they have steels drums since 1974.			
b. Is the date when drums were placed in storage marked on each drum?	___	___	___

not all the steels drums that were staraging had labels. Since, some of its were in corroded drums.

(3) Has hazardous waste been shipped from this facility since November 19, 1980?	✓	___	___
a. If "yes", approximately how many shipments were made? not apply.			

This industries had received/~~one~~ only shipped of Eli Lilly Industries of Carolina. The shipped consisted of:
flammable liq, NOS, liq., 220 gallons, F005.
However, at the time of inspection I rquested copy of the manifest used, but mr. Diaz can not found it. At respect, I was knowledgeable because we have copy of this in our office.

	YES	NO	DON'T KNOW
(4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980? not apply.			
a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made? not apply, because they are generators but they are TSD too. (they storage and incinerate as final disposal method).	____	____	____
b. If "no" or "don't know", please elaborate. not apply.			
c. Does each manifest (or a representative sample) have the following information? They have copy of our manifest. Mr. Diaz told me that in case of transport, they will going to use it. Though the industry has its proper manifest (refer to attachment #3), they go to use our manifest for obtain more industrial uniformity.			
- a manifest document number	✓	____	____
- the generator's name, mailing address, telephone number and EPA identification number.	✓	____	____
- the name, and EPA identification number of each transporter.	✓	____	____
- the name, address and EPA identification number of the designated facility and an alternate facility, if any:	✓	____	____
- a description of the wastes (DOT)	✓	____	____
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle.	✓	____	____

	YES	NO	DON'T KNOW
- a certification that the materials are properly classified, describe, packaged, marked and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA.	✓	___	___
(5) Were there any hazardous wastes stored on site at the time of the inspection?	✓	___	___
a. If "yes" do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?	___	___	___
b. If not properly packaged or in secure tanks, please explain.			
* c. Are containers clearly marked and labelled?	___	___	___
* d. Do any containers appear to be leaking?	✓	___	___
Some of the containers were leaking, because it were corroded.			
e. If "yes", approximately how many?			
* (6) Has the generator submitted and annual report to EPA covering the previous calendar year?	___	___	___
not apply.			
a. How do you know?			
not apply			

** Actually, the company is changing the corroded drum for new steel drum (containers of 55 gallons). many of this corroded drum ~~does~~ has not identification, but the company is analysing ~~this~~ its contained and putting it in new drums. There are drums that were leaking, but this leaked is gathered through lines until the storage tank Hazardous Waste. (Please refers to attachment # IV)

The Hazardous Waste storage tanks are marked with X.

	YES	NO	DON'T KNOW
(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago? not apply.	___	___	___
a. If "no", have Exception Reports been submitted to EPA covering these shipments? not apply.	___	___	___

(8) General comments.

Please refer to attached report.

* The effective date for this requirement is March 1, 1982.

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY

INSPECTION FORM FOR TSD FACILITIES ONLY

COMPANY NAME:
Eli Lilly and Company, Inc.,
Eli Lilly Industries
COMPANY LOCAL ADDRESS:

Road No. 2 Km. 146 Hm. 7
Bo. Sabanita, Mayaguez
Puerto Rico
COMPANY POSTAL ADDRESS:
G.P.O. Box 1748
Mayaguez, Puerto Rico

COMPANY CONTACT:
Mr. Vicente Díaz

TITLE:
Project Engineer

TELEPHONE NO.:
(809) 832-7846 / 228, 229 and 230

EPA I.D. NUMBER:
PRT0000100 66
INSPECTOR'S NAME:
Mr. Tomás Sanabria

TITLE:
Chemist
BRANCH/ORGANIZATION:
Hazardous Waste Bureau
Environmental Quality Board.
DATE OF INSPECTION: July 8, 1981

OTHER ENVIRONMENTAL PERMITS HELD BY FACILITY:

/ ✓ NPDES PR0000353

/ ✓ AIR PFE 579-0392-I-II-III-C

/ / OTHER

TIME OF DAY INSPECTION TOOK PLACE:

1) Is there reason to believe that the facility has hazardous waste on site?

   a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

/ ✓ Company admits that its waste is hazardous during the inspection.

/ ✓ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

/ ✓ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (S261.31). (F002, F003 and F005)*

not apply / / The waste material is listed in the regulations as a hazardous waste from a specific source (S261.32).

not apply / / The material or product is listed in the regulations as a discarded commercial chemical product (S261.33).

* The company generates D001 - non listed ignitable waste and D002 - non listed corrosive waste.

Please refer to page number 2 of the RA Generator Inspection Form.

/__/ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report).

not apply /__/ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
not apply b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	___	___	___

Please explain:

not apply

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

Please refer to attachment # 2

2) Does the facility generate hazardous waste?	✓	___	___
3) Does the facility transport hazardous waste?	___	✓	___
4) Does the facility treat, store or dispose of hazardous waste?	✓	___	___

VISUAL OBSERVATIONS

5) SITE SECURITY (S265.14)			
a. Is there a 24-hour surveillance system?	✓	___	___
b. Is there a suitable barrier which completely surrounds the active portion of the facility?	✓	___	___
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	___	✓	___
6) Are there ignitable, reactive or incompatible wastes on-site? (S265.17)	___	✓	___

	YES	NO	DON'T KNOW
a. If "YES", what are the approximate quantities? not apply			
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste? not apply	___	___	___
c. If "YES", explain: not apply.			
d. In your opinion, are proper precautions taken so that these wastes do not:			
- generate extreme heat or pressure, fire or explosion, or violent reaction?	___	✓	___
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	___	✓	___
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosions?	___	✓	___
- damage the structural integrity of the device or facility containing the waste?	___	✓	___
- threaten human health or the environment?	___	✓	___

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility? Since the exposure of the containers to moisture or direct sunlight will create a hazardous condition, the facility operator shall store the containers in an area with an overhead roof or other covering that does not obstruct the visibility of labels.

7) Does the facility comply with preparedness and prevention requirements including maintaining: (S265.32)

	YES	NO	DON'T KNOW
- an internal communications or alarm system? (They have three (3) systems.	✓	___	___
- a telephone or other device to summon emergency assistance from local authorities?	✓	___	___
- portable fire equipment?	✓	___	___

	YES	NO	DON'T KNOW
- adequate aisle space?	✓		

- in your opinion, do the types of wastes on-site require all of the above procedures, or are some not needed? Explain
yes, for more details, please refer to the answer of the questions 6.e of the page 3.

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain

8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? not apply

If you have, please comment as appropriate.
not apply.

9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain. ✓

b. Do you believe that operation of this facility may affect groundwater quality? ✓

c. If "YES", explain. not apply

RECORDS INSPECTION

10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)? ✓

a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received?
At respect, mr. Diaz did not find the copy of the manifest for each hazardous waste load received.

	YES	NO	DON'T KNOW
b. How many post-November 19 manifests does it have? (If the number is large, you may estimate). Only one (1).			
c. Does each manifest (or a representative sample) have the following information?: They use its proper manifest system, but is equivalent to our system.			
- a manifest document number	✓		
- the generator's name, mailing address, telephone number, and EPA identification number	✓		
- the name, and EPA identification number of each transporter	✓		
- the name, address and EPA identification number of the designated facility and an alternate facility, if any:	✓		
- a DOT description of the wastes	✓		
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	✓		
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA.	✓		
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If "YES", explain. not apply			
11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (S265.13)		✓	

	YES	NO	DON'T KNOW
a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary _____ All wastes are basically the same ✓ Company treats all waste as hazardous _____ Don't know _____			
b. Does hazardous waste come to this facility from off-site sources? Sometimes the hazardous waste comes from Eli Lilly of Carolina.	✓		
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?		✓	

12) INSPECTIONS (S 265. 15)

a. Does the facility have a written inspection schedule? They have record of the inspection but not as required by R.C.R.A.		✓	
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?	✓		
c. Does the owner/operator record inspections in a log?		✓	
d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES", please explain.		✓	

13) PERSONNEL TRAINING (S 265.16) They do not have any information at respect.

a. Is there written documentation of the following: - job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?		✓	
- type and amount of training to be given to personnel in jobs related to hazardous waste management?		✓	

	YES	NO	DON'T KNOW
- actual training or experience received by personnel?	✓		
14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (S265.51)			
a. Does the plan describe arrangements made with local authorities?			
b. Has the contingency plan been submitted to local authorities?			
How do you know?	During the inspection I saw the written contingency plan but Mr. Diaz could not give a copy because, he had a draft.		
c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators?			
d. Does the plan have a list of what emergency equipment is available?			
e. Is there a provision for evacuating facility personnel?			
f. Was an Emergency Coordinator present or on call at the time of the inspection?			
15) Does the owner/operator keep a written operating record with: (S265.73)			
- a description of wastes received with methods and dates of treatment, storage or disposal?		✓	
- location an quantity of each waste?		✓	
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility?		✓	
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?		✓	

The industry do not have a written closure plans.

	YES	NO	DON'T KNOW
16) Does the facility have written closure and post-closure plans? (S 265.110)	___	✓	___
a. Does the written closure plan include:			
- a description of how and when the facility will be partially (if applicable) and ultimately closed?	___	✓	___
- an estimate of the maximun inventory of wastes in storage or treatment at any time during the life of the facility?	___	✓	___
- a description of the steps necessary to decontaminate facility equipment during closure?	___	✓	___
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?	___	✓	___
b. What is the anticipated date for final closure? I do not know, because they do not have a closure plans.	___	___	___
c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities? not apply.	___	___	___
d. Does the written post-closure plan include: not apply.			
- a description of planned groundwater monitoring activities and their frenquencies during post-closure?	___	___	___
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?	___	___	___
- the name, address and phone number of a person or office to contact during post-closure?	___	___	___
17) Does the owner/operator have a written estimate of the cost of closing the facility? (265.142) What is it? ?	___	✓	___
18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it (S265.144) not apply.	___	___	___

not apply

	YES	NO	DON'T KNOW
19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities). (S265.90)	not apply		
a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste management area?	not apply	___	___
b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area?	not apply	___	___

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT	DISPOSAL
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p. 7	✓ Incineration pp. 12-13	Surface Impoundment p. 8
✓ Tank, above ground p. 8	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	✓ Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	
	Other _____	

	YES	NO	DON'T KNOW

CONTAINERS (S265.170)

1) Are there any leaking containers? ✓
If "YES", explain.

Some of the steels drum were corroded.

2) Are there any containers which appear in danger of leaking? ✓
If "YES", explain.

Since, many of these drums were in bad conditions

3) Do wastes appear compatible with container materials? ✓

4) Are all containers closed except those in use? ✓

5) Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak? ✓

6) How often does the plant manager claim to inspect container storage areas? Since, there is many employees working in this area, they confront the drums daily.

7) Does it appear that incompatible wastes are being stored in close proximity to one another? ✓
If "YES", explain.

8) Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facilitys property line? ✓

9) What is the approximate number and size of containers with hazardous wastes?
eight hundreds (800)

TANKS (S265.190)

1) Are there any leaking tanks? ✓
If "YES", explain.

	YES	NO	DON'T KNOW
2) Are there any tanks which appear in danger of leaking? If "YES", explain. Some of the steels drums were corrode.	✓		
3) Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.		✓	
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	not apply.		
5) Where hazardous waste in continously fed in a tank, is the tank equipped with a means to stop this inflow?	✓		
6) Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.		✓	

7) How often does the plant manager claim to inspect container storage areas?
Mr. Diaz told that they inspect daily, but he had not evidence of that.

	YES	NO	DON'T KNOW
8) Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain. Refer to page 3, 6e.		✓	

9) What is the approximate number and size of tanks containing hazardous wastes? 2 (two)

SURFACE IMPOUNDMENTS not apply (S265.220)

	YES	NO	DON'T KNOW
1) Is there at least 2 feet of freeboard in the impoundment?			

	YES	NO	DON'T KNOW
8) Are bulk or non-containerized wastes containing free liquids placed in the landfill? If "YES",	___	___	___
a. Does the landfill have a liner which is chemically and physically resistant to the added liquid?	___	___	___
b. Is the waste treated and stabilized so that free liquids are no longer present?	___	___	___
9) Are containers holding liquid waste or waste containing free liquids placed in the landfill?	___	___	___
10) Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills?	___	___	___
If so, are they crushed flat, shredded or similary reduced in volume before they are buried?	___	___	___

not apply

11) What is the approximate area of the hazardous waste landfill?

INCINERATORS AND THERMAL TREATMENT

(S265.340 and 265.379)

1) What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?

Boiler

2) Was hazardous waste being incinerated or thermally treated during your inspection? If "YES", answer all following question. If "NO", answer only questions 3 and 7.	___	✓	___
3) Has waste analysis been performed (and written records kept) to include:			
- heating value of the waste	___	✓	___
- halogen content	___	✓	___
- sulfur content	✓	___	___

At respect, Mr. Diaz gave a copy of a fuel consumption and percent sulfur content report.

	YES	NO	DON'T KNOW
- concentration of lead	___	✓	___
- concentration of mercury	___	✓	___

NOTE: Waste analysis need not be performed on each waste load if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check there [ ].

4) Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes? not apply. ___ ___ ___

5) Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for: not apply

- waste feed	___	___	___
- auxiliary fuel feed	___	___	___
- air flow	___	___	___
- incinerator temperature	___	___	___
- scrubber flow	___	___	___
- scrubber pH	___	___	___
- relevant level controls	___	___	___

Every hour for:

- stack plume (color and opacity)	___	___	___

6) Is there open burning of hazardous waste? ___ not apply ___

a. If "YES", what is being burned? (Only burning or detonation of explosives is permitted).

b. If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

	YES	NO	DON'T KNOW
7) Does the incinerator appear to be operating properly? (Do emergency shutdown controls and system alarms seem to be in good working order?) Please explain. During the inspection, the incinerator was put out, but Mr. Diaz told me that it has emergency shutdown controls.	___	___	✓
a. Is there any evidence of fugitive emissions? Because, during the inspection it was put out.	___	___	✓
8) Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain. The residues are biodegraded in its wash water treatment plant.	✓	___	___
9) What types of air pollution control devices (if any) are installed on the incinerator? It has scrubber			

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (S265.400)

1) Does the treatment process system show any signs of ruptures, leaks, or corrosion? Please explain.	___	✓	___
2) Is there a means to stop the inflow of continuously-fed hazardous wastes?	✓	___	___
3) Is there ignitable or reactive waste fed into the treatment system?	___	✓	___
If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how. not apply.	___	___	___
Are the incompatible wastes placed in the same treatment process? If "YES", explain.	___	✓	___

4) Describe the treatment system at this facility.

Please, refer to the attached report.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

239

RCRA GENERATOR INSPECTION CHECKLIST

Generator's Name: Eli Lilly and Company, Inc. Pharmaceutical Chemical Plant

EPA I.D. #: PRT000010066

Generator's Address: Mayaguez, Puerto Rico 00708

Contact: Mr. Vicente Díaz.

		YES	NO
1.	Does generator have an EPA I.D. number?	(✓)	( )
2.	Does generator store material on-site?	(✓)	( )
3.	Is waste accumulated for more than 90 days?	(✓)	( )
4.	Does generator manifest waste?	( )	( )
5.	Does manifest show following information:		
	a. Name, address, I.D. of generator	( )	( )
	b. Name, address, I.D. of transporter	( )	( )
	c. Name, address, I.D. of designated facility	( )	( )
	d. Name, of alternative facility	( )	( )
	e. DOT waste description	( )	( )
	f. Quantity of waste-volume, weight, number of containers	( )	( )
	g. Signed certification statement	( )	( )
6.	Does generator maintain manifest records?	( )	( )

N/A.

7. General Comments:

They aren't using the manifest. They don't transport anything. They incinerate solvents in its industries. They have storage like 150 of steels drums of differents compounds The facilty setup will continue working in this case.

725-5140
ext. 285, 290, 314

Inspected By: Tomás Sanabria.

Date: March 11, 1981

RCRA INSPECTION REVIEW SHEET

Name of Facility - Eli Lilly Industries, Mayaguez
RCRA ID Number - PRT000040066
Date of Inspection - July 8, 1981
Type of Inspection: Generator X Transporter ____ TSD X

Name of EPA/State Inspector -
Mr. Tomás Sanabria González, Chemist
Hazardous Waste Bureau
Environmental Quality Board
Santurce, Puerto Rico

Findings of Inspection:

The industry has large quantities of hazardous waste. They are stored in steel drums of 55 gallons since 1974. Actually, they are constructing a hazardous waste storage area for this waste. Among the waste that is generated, I can mention: acetone, 11,420 gal/wk; ethyl ether 265 gal/wk; toluene 1,000 gal/wk; acetate 3,000 gal/wk. These are biodegraded in its water Treatment Plant.

On letter dated on March 20, 1981, we requested a chemical analysis of the solid sludge generated in this plant. It was performed by Orlando Laboratories, Inc. in Florida. It revealed that this waste is non-hazardous. In regard the to other hazardous waste that they have since 1974, they are changing the damage steels drums for new ones, and finally incinerated them.

At the time of inspection, the industry did not have some of the documents required by part 265 (Standard for owners and operators of hazardous waste treatment, storage and disposal facilities) of the Federal Register of May 19, 1980. Therefore is in violation to the above mentioned Regulation.

Action(s) Taken:

Action(s) Recommended: